

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL MAGNALDI,)
)
Defendant.)

Order Modifying the Terms
of Defendant's Pretrial Release
to Permit Travel

Case No. 7:20-cr-00090-VB-1

2/28/20

ORDER

THIS MATTER having been brought before the Court on motion of Defendant, Michael Magnaldi, by and through Counsel, for an Order modifying the terms of the Defendant's pretrial release to permit travel to Statesboro, Georgia and to ~~direct the temporary return of the Defendant's travel documents~~, and the Court having considered the matter and good cause appearing,

WB

IT IS on this 28th day of Feb., 2020,

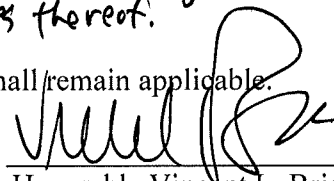
ORDERED that the terms of Defendant's pretrial release shall be modified as follows:

Defendant shall be permitted to travel to Statesboro, Georgia on March 7, March 14, March 28, and April 4, 2020, as well as one (1) day before and one (1) day after the above-referenced dates for the purpose of accompanying ~~her~~ ^{his} daughter during a

dancing competition, provided that prior to each travel event defendant provides a full itinerary to Pretrial Services, and Pretrial Services approves thereof.

WB

All other terms of Defendant's pretrial release shall remain applicable.


2/28/20
Honorable Vincent L. Briccetti, U.S.D.J.

February 28, 2020

The Honorable Vincent L. Briccetti
U.S. District Court for the Southern District of New York
United States Courthouse
300 Quarropas Street, Room 630
White Plains, New York, 10601

Re: United States v. Michael Magnaldi
Case No. 7:20-cr-00090-VB-1

Dear Judge Briccetti:

I write this letter to Your Honor in lieu of a more formal Notice of Motion with regard to an application to modify the bail of my client, Defendant Michael Magnaldi, to permit travel to the State of Georgia for the purpose of attending his daughter's dance contest. Mr. Magnaldi has entered a guilty plea to a two-count (2) information regarding tax fraud under 26 U.S.C. §§ 7206(1) and 7206(2) on February 3, 2020. Sentencing on this matter has been scheduled before Your Honor on May 8, 2020.

The terms of the Defendant's appearance bond, dated February 3, 2020, required, among other things, that he surrender all travel documents and that his travel be restricted to the Southern District of New York, the Eastern District of New York, and intervening States to and from Florida. Mr. Magnaldi presently resides in the State of Florida.

The Defendant's daughter is competing in four (4) dance competitions on March 7, 14, 28, and April 4, 2020 from 11:00 a.m. to 7:45 p.m. at Georgia Southern University Performing Arts Center in Statesboro, Georgia. For this reason, the Defendant requests that the conditions of his appearance bond be modified to permit his travel to Georgia on March 7, March 14, March 28, and April 4, 2020, as well as on one (1) day before and one (1) day after the above-reference dates, to allow him to accompany his daughter during the competition sessions.

In support of this request, it is noted that the Defendant has fully complied with all of the terms of his pretrial release to date in this matter. In addition, the February 3, 2020 terms of the Defendant's appearance bond allows travel within the

Re: Michael Magnaldi
Request for Modification of Bail Conditions
February 28, 2020

intervening States to and from Florida, which include the State of Georgia for travel purposes only.

The Government has been notified of this application, and Assistant United States Attorney David Felton consents to this application, provided that a full itinerary will be provided to and approved by a Pretrial Services Officer. Also, Pretrial Services Officer Daniel Dumpit has been notified and has approved Mr. Magnaldi's proposed travel to the State of Georgia for his daughter's dance contest, subject to your Honor's approving of this application and the Defendant's providing of a full itinerary.

Accordingly, the Defendant hereby request the Court for a modification of the terms of his bail to permit this travel for the purpose of attending his daughter's dance contest. Thank you for your every consideration.

Respectfully Submitted,

s/ _____

PATRICK A. MULLIN

PAM/rs

cc: AUSA David Felton
Pretrial Services Officer Daniel Dumpit
Michael Magnaldi